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April 13, 1998

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APR 13 1998

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Attention: Stop Code 1800D5
Chief, Allocations Branch

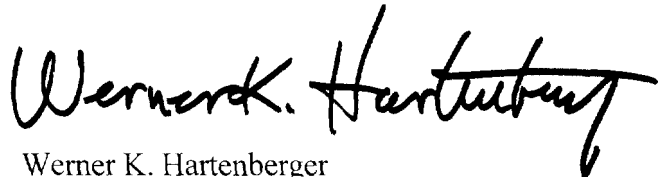
Re: Amendment of Section 73.202(b) of the Commission Rules
Table of FM Channel Allotments
(Macon and Hampton, Georgia)
MM Docket No. 98-18; RM-9204

Dear Ms. Salas:

On behalf of Cox Radio, Inc. ("CRI"), we hereby transmit to you an original and four copies of CRI's comments in the above-captioned proceeding.

Please contact the undersigned if any questions should arise.

Respectfully submitted,


Werner K. Hartenberger

Enclosure

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Chief, Allocations Branch:
Stop Code 1800D5

Cox Radio, Inc. ("Cox"), its attorneys, hereby submits these comments in opposition to the above-referenced petition of U.S. Broadcasting Limited Partnership ("USBLP"), licensee of Radio Station WPEZ(FM), for reallocation of Channel 300C1 from Macon to Hampton, Georgia, and the modification of USBLP's license for Station WPEZ to specify Hampton as its community of license. As shown herein, USBLP proposes to move WPEZ to a suburb of Atlanta at the expense of WPEZ's original community of license. Such a reallocation is not in the public interest and undermines the Commission's mandate for a fair, equitable and efficient distribution of radio service.

USBLP alleges that the reallocation of WPEZ would constitute a first local broadcast transmission service to Hampton, Georgia and therefore satisfy the Commission's FM allotment priority policy.¹⁷ However, the Commission has stated that it would not blindly apply the first

¹⁷ In determining whether a preferential allotment would result from USBLP's petition, the Commission will compare the existing arrangement of allotments with the proposed

local service FM Allocation Priority when a station seeks to reallocate an FM channel from a rural community to a suburban community of a nearby Urbanized Area. Rather, a licensee's application is scrutinized to determine if the licensee will provide signal coverage to the metropolis at the expense of the licensee's original community of license.^{2/} Upon close examination of the petition, USBLP knowingly offers obsolete data to obscure Hampton's bedroom community relationship with Atlanta which does not warrant first local transmission service priority.

According to eight-year old census figures, Hampton lies just outside of Atlanta's Urbanized Area; however, the tremendous growth of the Atlanta Region^{3/} suggests that, if current data are used, the Urbanized Area includes Hampton. Between 1990 and 1997, the population of the Atlanta Region has increased from 2,557,800 to 3,033,400—a 19% increase,^{4/} the second fastest growing region in the country.^{5/} For the decade preceding the 1990 census, the

arrangement of allotments using the FM allotment priorities: (1) first full-time aural service; (2) second full-time aural service; (3) first local service; and (4) other public interest matters (with co-equal weight given to priorities (2) and (3)). See *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982).

^{2/} *Community of License*, 5 FCC Rcd 7094, 7096 (1990) ("*Community of License MO&O*").

^{3/} The Atlanta Region is comprised of the following counties: Cherokee, Clayton, Cobb, DeKalb, Douglas, Fayette, Fulton, Gwinnett, Rockdale and Henry. ATLANTA REGIONAL COMMISSION, 1997 POPULATION AND HOUSING 2 (Nov. 1997) ("*ATLANTA POPULATION AND HOUSING*").

^{4/} *Id.* at 10.

^{5/} Lucy Soto, *Atlanta Is Riding a Population Rocket*, THE ATLANTA JOURNAL AND CONSTITUTION at 1A (Jan. 1, 1998). For the sake of comparison, the national average for growth rate is 1%. Alastair Goldfisher, *Survey Finds San Jose's Growth Potential Stunted*, BUSINESS JOURNAL-SAN JOSE at 12 (Oct. 13, 1997). A chart illustrating the Atlanta Region's growth is attached hereto as Exhibit A.

Atlanta Region population boomed from 1,896,182 to 2,557,800—a 35% increase.^{6/} Hampton's growth from 1990 through 1996 has exceeded this rate, increasing from 2,694 to an estimated 4,311 people—a 62% increase.^{7/} Henry County is the fastest growing county in the Atlanta Region and the sixth fastest in the nation,^{8/} at a rate of 8.6% between 1996 and 1997 alone.^{9/} Its population has ballooned from 36,309 in 1980 to 59,200 in 1990 and will almost double to an estimated 115,400 within four years.^{10/} This population explosion has pushed the boundaries of the Atlanta Urbanized Area outward in dramatic leaps.^{11/} By 1990, Atlanta's Urbanized Area stretched to less than five miles of Hampton.^{12/} Given the exploding growth of the Atlanta Region including Hampton and Henry County, it is likely that Hampton presently rests within the Atlanta Urbanized Area. Indeed, the Atlanta Regional Commission believes that the 2000 census may show Hampton within the Atlanta Urbanized Area.^{13/}

^{6/} ATLANTA POPULATION AND HOUSING 10.

^{7/} Population Estimates for Cities 1991-1996, 1980 and 1990 Census
<<http://sdrcent.pp.gatech.edu/citypop.htm>>.

^{8/} Doug Monroe, *Three Metro Counties Among Ten Fastest-Growing in U.S.*, THE ATLANTA JOURNAL AND CONSTITUTION at 1A (Mar. 20, 1997).

^{9/} ATLANTA POPULATION AND HOUSING 6.

^{10/} *Id.*; *USBLP Petition for Rulemaking* at 12 (Nov. 19, 1997) ("*USBLP Petition*").

^{11/} An illustration of the dramatic growth of the Atlanta Urbanized Area is attached hereto as Exhibit B.

^{12/} *USBLP Petition* at 3.

^{13/} Telephone Interview by Nicole Mathis with Jim Skinner, Senior Planner, Research Division, Atlanta Regional Commission (Apr. 7, 1998).

Under these circumstances, the Commission cannot make an informed decision as to the extent of the Atlanta Urbanized Area based on eight-year old data for an area undergoing expansive growth. USBLP's use of old data hides relevant information from the Commission. Thus, USBLP is obligated to demonstrate that Hampton is distinct and independent from Atlanta using the criteria enumerated in *RKO General, Inc.*, 5 FCC Rcd 3222 (1990) ("*KFRC*") and *Richard Tuck*, 3 FCC Rcd 5374 (1988) to justify a first local service preference.

USBLP's petition wholly fails to demonstrate that Hampton is independent from Atlanta. With respect to signal population coverage, USBLP states that the proposed operation of WPEZ would place a city grade signal over Hampton and more than seventeen percent of the Atlanta Urbanized Area; however, this conclusion is based on outdated census figures. The Atlanta Urbanized Area is presently much larger than it was in 1990 and, therefore, USBLP's figures underrepresent the area served. As for size, Hampton's population was 2,694 people in 1990 whereas 415,200 people lived in Atlanta. Therefore, Hampton is approximately 1/150th the size of Atlanta under 1990 census figures. With respect to proximity, Atlanta is an easy commute for Hampton residents since approximately only twenty-five miles separates the two communities.^{14/} Considering Hampton's proximity to Atlanta, and the large number of persons in the Atlanta market, it is likely that WPEZ's wide coverage is intended to serve Atlanta rather than the Hampton radio market.

^{14/} The executive director of the Henry County Economic Development Authority, Robert White, in calling Henry County a "bedroom community" of Atlanta, commented that "residents like the proximity to downtown Atlanta—the 30-minute drive is now considered close-in—and developers like its rail facilities and seven interchanges on Interstate 75." Mark Meltzer, *Metro's Growth Potential in Top 100*, ATLANTA BUSINESS CHRONICLE at 3A (Oct. 3, 1997).

As for the Commission's final criterion, Hampton is significantly dependent upon Atlanta. By USBLP's own estimates, approximately seventy percent of the workforce travels outside of the community for work. This level is higher than figures the Commission previously has found to demonstrate a community's lack of independence.^{15/} The Federal Aviation Administration, which USBLP characterized as the area's largest local employer, is not located in Hampton.

Hampton is linked economically with Atlanta through a shared advertising market. The Atlanta metro radio market encompasses Hampton.^{16/} Arbitron's ratings include Henry County as part of the Atlanta metro radio market,^{17/} thus illustrating Hampton's importance to the purchase of advertising in the market. Hampton also is included in the Atlanta Designated Market Area and Metropolitan Statistical Area.

Hampton is served by four Henry County newspapers (THE HENRY HERALD, THE HENRY NEIGHBOR, THE DAILY HERALD and THE HENRY OBSERVER), but not by a Hampton newspaper. THE ATLANTA JOURNAL AND CONSTITUTION has wide distribution throughout Hampton and

^{15/} *Elizabeth City, North Carolina, and Chesapeake, Virginia*, 9 FCC Rcd 3586, 3589 (1994) (finding that 40% of Chesapeake residents working in Chesapeake indicates that it is not independent of Norfolk); *KFRC* at 3224 (finding that 35.1% of Richmond residents work in Richmond suggests that it is not independent of San Francisco).

^{16/} INVESTING IN RADIO MARKET REPORT '98 (attached hereto as Exhibit C); RADIO ADVERTING SOURCE (Mar. 1998) (attached hereto as Exhibit D).

^{17/} ARBITRON QUARTERLY RATINGS 2 (Fall 1997) (attached hereto as Exhibit E).

Henry County.^{18/} Hampton does not have its own cable system.^{19/} The lack of a Hampton newspaper, broadcast station or cable system demonstrates that its needs are sufficiently met by existing Atlanta Region media outlets.

Hampton's provision of municipal services is extremely limited. Hampton's fire services are provided by Henry County. Henry County also provides Hampton with the services of its Coroner's and Medical Examiner's offices. Hampton's only school educates children from kindergarten through fifth grade; children in middle school and high school are sent to other communities. The Parks and Recreation Department is administered by Henry County. Hampton has no public transportation system. The limited extent of Hampton's municipal management requirements are reflected by the fact that its Mayor and City Council members work part-time and are paid \$4,800 per year and \$1,800 per year, respectively.

Hampton does not have its own phone directory, but its listings are included in a directory that covers part of the Atlanta Urbanized Area.^{20/} Hampton merits only a single zip code. Hampton does not have a Chamber of Commerce. Its health care facility is nothing more than a two-doctor clinic which is closed for lunch, weekends and before 8 a.m. and after 6 p.m. on weekdays. The clinic directs emergencies to a hospital within the Atlanta Urbanized Area in Riverdale, Georgia.

^{18/} The Commission in *KFRC* found the lack of a community newspaper and the wide distribution of the urban area's newspaper to be significant in finding a community interdependent. *KFRC*, 5 FCC Rcd at 3224.

^{19/} 1997 CABLE & TV STATION COVERAGE ATLAS 429 (1997). The lack of a cable system weighs against a finding that the community is independent. *See Elizabeth City, North Carolina, and Chesapeake, Virginia*, 9 FCC Rcd at 3589.

^{20/} *See* CLAYTON-FAYETTE-HENRY COUNTIES, GA TELEPHONE DIRECTORY 10 (Apr. 1997 - 1998) (attached hereto as Exhibit F).

Hampton's shopping is limited to a few independent retail stores. According to the Hampton City Clerk, the majority of residents commute to Atlanta or surrounding communities for shopping and entertainment.^{21/} No nationally-recognized civic organizations have a Hampton charter.

When viewed through the prism of the Commission's criteria, USBLP's proposal calls for treating WPEZ's move-in as a proposed Atlanta allocation. Hampton is a short distance from Atlanta and is or soon will be within the Urbanized Area. At the same time, the interrelationship of Hampton and Atlanta is already apparent. Hampton is treated as part of the Atlanta market by advertisers, Hampton's needs are adequately served by an abundance of Atlanta Region media, Hampton's provision of municipal services is limited, and its residents work, shop and entertain themselves outside of Hampton.^{22/}

Against this background, USBLP's characterization of Hampton as independent is unconvincing. Thus, USBLP's petition should be treated as a reallocation to Atlanta and undeserving of a first local service preference.

^{21/} Telephone Interview by Nicole Mathis with Elaine Haynes, City Clerk of Hampton, Georgia (Apr. 7, 1998).

^{22/} It is peculiar that USBLP has chosen to reallocate WPEZ to Hampton. USBLP is the licensee of four Macon radio stations. By moving WPEZ to Hampton, USBLP is splitting its operations thus decreasing the company's operational efficiencies. Other than the obvious benefit of serving a good portion of Atlanta's Urbanized Area, there is no other reason for WPEZ to move from Macon. It may be that this reallocation petition is the first step in a two-step process to eventually serve all of Atlanta. In the future, under certain circumstances, if WPEZ is reallocated to Hampton, USBLP could seek to relocate its transmitter further north by filing a minor change application. If such a request were granted, WPEZ's coverage of Atlanta would likely increase to greater than 50% and USBLP would have bypassed the Commission's 307(a) scrutiny. For these reasons, the Commission reasonably may question USBLP's sincerity in actually serving Hampton and not using this suburb as a stepping stone to serve Atlanta.

II. USBLP's Petition Is Not in the Public Interest.

Because USBLP fails to demonstrate that Hampton is outside the Urbanized Area using current data, and that Hampton is not independent, its proposal does not merit a first local service preference. Therefore, the reallocation of WPEZ to Hampton should be reviewed under allotment priority (4) other public interest matters. The facts behind USBLP's petition demonstrate that the public interest is better served by leaving in place the current allocation.

Hampton's population is 2,694 people while Macon's population is 107,365 people. Macon receives 1 mV/m reception service from at least seventeen commercial radio stations, excluding WPEZ,^{23/} but Hampton is abundantly served by a significant number of aural services from the Atlanta radio market.^{24/} Under these circumstances, both communities are well served. Based on precedent, the Commission grants allotments to the larger of the two communities.^{25/} Accordingly, WPEZ should remain licensed to Macon.

USBLP's argument that there will be a net gain in serving nearly two million people with a net loss of 403,028 people is unpersuasive since there always will be a net gain when moving a transmitter closer to an urban area. Even with an overall gain in population, the Commission must consider the loss of service to Macon in evaluating the public interest of USBLP's

^{23/} See *USBLP Petition* at 5.

^{24/} *Id.* fig. 4.

^{25/} See, e.g., *Mount Horeb, Mazomanie and Dodgeville, Wisconsin*, 12 FCC Rcd 11963, 11964 (1997); *Stamford and Whiteboro, New York*, 7 FCC Rcd 1674, 1674 (1992).

proposal.^{26/} When, as is the case here, Macon's loss area has many fewer services than the gain area in Hampton, the public interest is strongly in favor of retaining the existing allotment.

The Commission has recognized that "the public has a legitimate expectation that existing service will continue."^{27/} USBLP estimates that 403,028 people over a wide geographic area (12,307 square kilometers) will lose reception of WPEZ. These individuals are precisely the types of persons the Commission expressed concern about in *Community Modifications II*.^{28/} If USBLP's petition is granted the net result will be that over four hundred thousand people, with a legitimate expectation of continued service, will suddenly find that they simply no longer have access to a radio station they had relied on for almost twenty-five years.^{29/} These individuals will not even be offered a substitute service. Therefore, any purported gains in population that would result from WPEZ's reallocation would be erased by the loss in existing service to over four hundred thousand Macon radio listeners.^{30/}

III. Conclusion.

The Commission should deny USBLP's petition to reallocate WPEZ from Macon to Hampton. Hampton's proximity to Atlanta, its relative size, and its lack of independence show

^{26/} See, e.g., *Television Corp. v. FCC*, 294 F.2d 730 (D.C. Cir. 1960); *WLCY-TV*, 16 FCC 2d 506 (Rev. Bd. 1969).

^{27/} *Change of Community MO&O*, 5 FCC Rcd at 7097.

^{28/} *Id.*

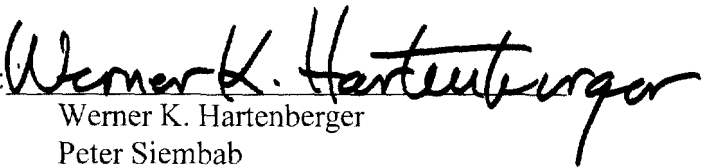
^{29/} WPEZ was licensed on October 19, 1973. BROADCASTING & CABLE YEARBOOK 1997 at B-115.

^{30/} The Commission in *Eatonton and Sandy Springs, Georgia, and Anniston and Lineville, Alabama*, 6 FCC Rcd 6580 (1991), denied the petitioner's reallocation in part due to the loss of service to approximately 400,000 people.

that the reallocation of WPEZ does not merit first local service priority. USBLP's proposal further consolidates media into an already saturated market and undermines the Commission's public interest objectives. For these reasons, CRI respectfully submits that the Commission deny USBLP's petition to reallocate WPEZ to Hampton.

Respectfully submitted,

COX RADIO, INC.

By: 
Werner K. Hartenberger
Peter Siembab

Its Attorneys

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April 13, 1998

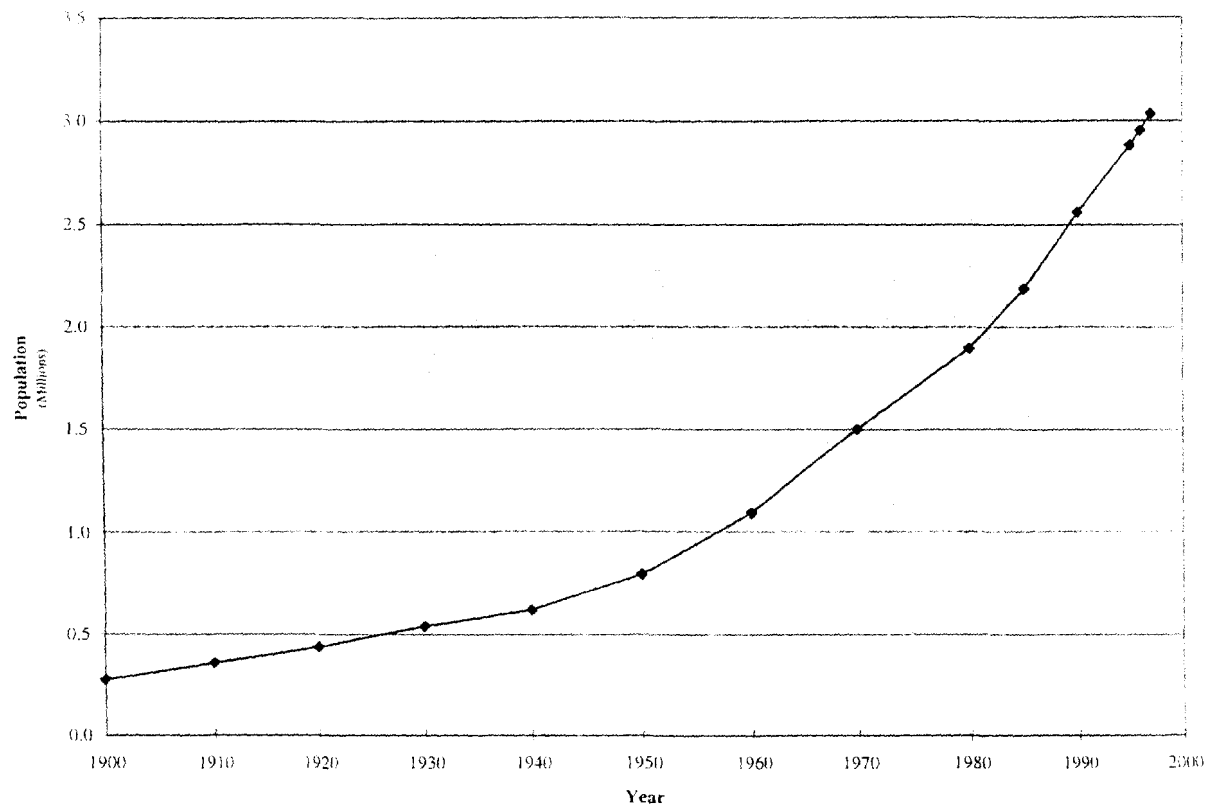
EXHIBIT A

Comments of Cox Radio, Inc.
Opposition to USBLP's Reallotment Petition
April 1998

EXHIBIT A

Illustration of Atlanta Region Growth

Population of the Atlanta Region 1900-1997



Source: Atlanta Regional Commission, U. S. Bureau of the Census

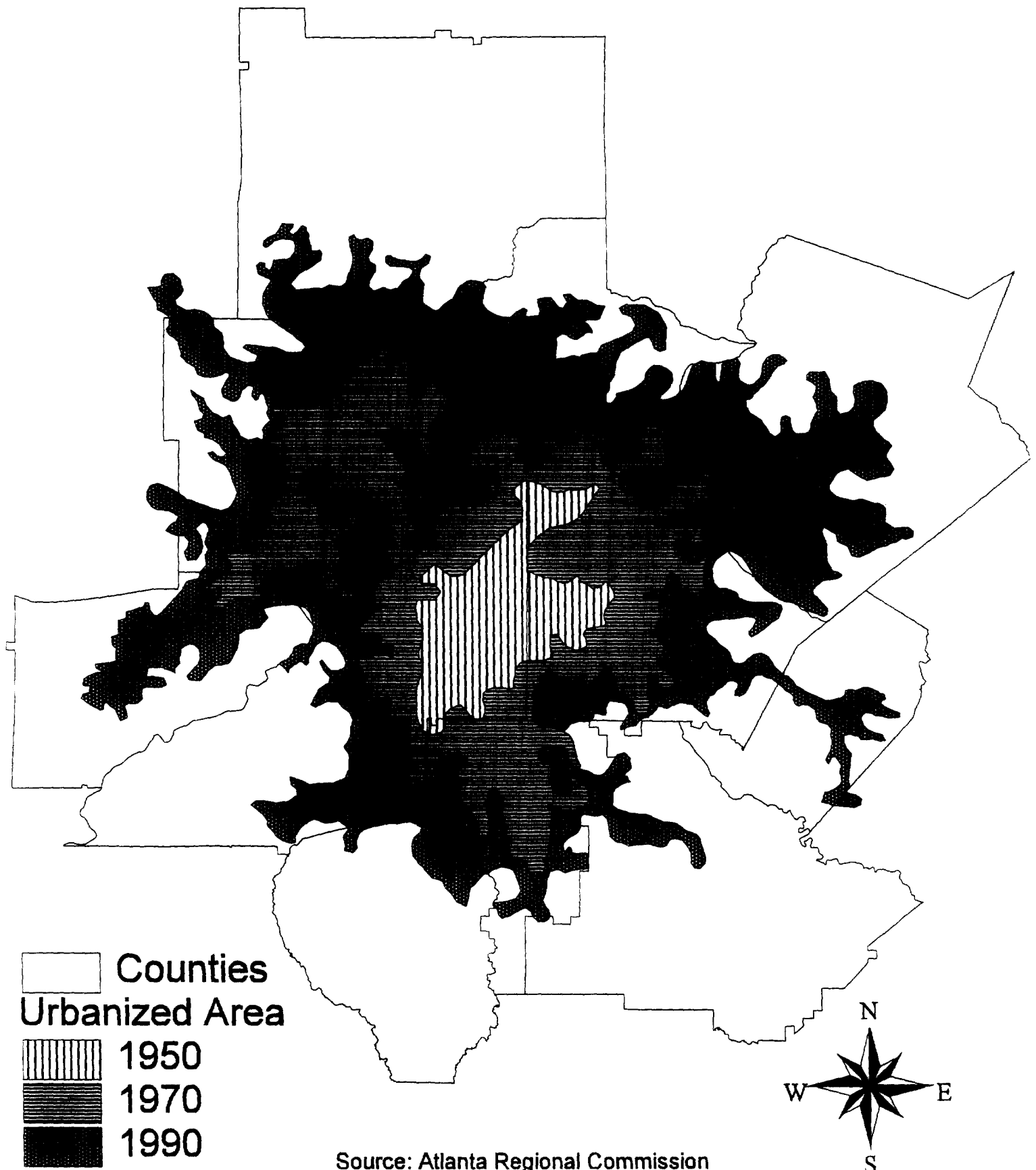
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EXHIBIT B

Atlanta Urbanized Area Growth Map

Change in Urbanized Area 1950-1990

The Atlanta Region (10-County)



Source: Atlanta Regional Commission

Comments of Cox Radio, Inc.
Opposition to USBLP's Reallotment Petition
April 1998

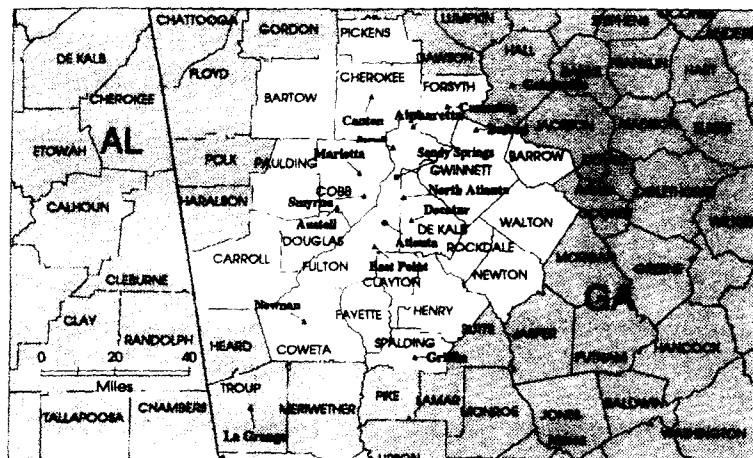
EXHIBIT C

Investing in Radio Market Report '98—Atlanta Radio Market Map and Statistics

Metro Rank: 12

Revenue Rank: 10

Atlanta, GA Market Overview



Metro Counties / Population (000)

Barrow, GA	37.5
Bartow, GA	65.7
Carroll, GA	80.5
Cherokee, GA	121.6
Clayton, GA	203.9
Cobb, GA	546.3
Coweta, GA	78.0
De Kalb, GA	582.2
Douglas, GA	85.9
Fayette, GA	83.7
Forsyth, GA	67.9
Fulton, GA	725.8
Gwinnett, GA	487.7
Henry, GA	93.4
Newton, GA	53.5
Paulding, GA	66.3
Pickens, GA	18.1
Rockdale, GA	66.4
Spalding, GA	57.7
Walton, GA	50.1

3,582.2

Market Radio Financials

(all figures in 000's, except percentages and ratios)

ESTIMATED GROSS REVENUES ★ ★	1991	1992	1993	1994	1995	1996	Δ 91 - 96
	\$108,800	\$111,400	\$124,000	\$149,500	\$173,600	\$192,900	12.1%
	Δ 96 - 97	1997	1998	1999	2000	2001	Δ 97 - 01
	15.2%	\$222,200	\$242,200	\$261,600	\$285,100	\$305,100	8.2%
Revenue/Retail Sales	1991	1996	2001				
Revenue/Capita	\$4.37/1,000	\$5.13/1,000	\$6.10/1,000				
	\$34.69	\$53.85	\$75.58				
							Est. Breakout
							Local 78%
							National 22%

Demographic and Economic Overview

(000's, except Retail Sales and EBI in 000,000's)

	1991	1996	Growth Rate	1996	2001	Growth Rate
MSA Population	3,136.6	3,582.2	2.7%	3,582.2	4,036.7	2.4%
Households	1,167.5	1,330.2	2.6%	1,330.2	1,513.1	2.6%
Retail Sales	24,910.0	37,638.5	8.6%	37,638.5	50,029.3	5.9%
EBI	50,082.1	61,320.6	4.1%	61,320.6	80,027.5	5.5%

Demographic Breakdown

	Total	Under 12	12 - 17	18 - 24	25 - 34	35 - 44	45 - 54	Over 55
Men (000)	1,752.1	331.1	153.0	165.5	313.5	326.2	238.3	224.5
Women (000)	1,830.1	316.1	146.6	166.4	316.7	344.8	239.8	299.6
Total	3,582.2	647.2	299.6	332.0	630.2	671.0	478.1	524.1
Percentage	100.0%	18.1%	8.4%	9.3%	17.6%	18.7%	13.3%	14.6%
Per Capita \$ 17,118		Median Household \$ 37,976				Avg Household \$ 46,099		
Ethnic Population:	White 71.6%	Black 25.7%		Asian 2.0%		Hispanic 2.3%		

Market Summary

	Class A	Class B	Class C	Viable FMs	All FMs	All AMs	Total
# Stations	3		14	13	17	26	43
Tot 12+	0.0		72.8	67.6	72.8	13.9	86.7
Avg 12+	0.0		5.2	5.2	4.3	0.5	2.0
Tot LCS	0.0		84.0	78.0	84.0	16.0	100.0
Avg LCS	0.0		6.0	6.0	4.9	0.6	2.3

Competitive Overview

I Stations

Calls	City of License	FCC Class	Freq	Power (kW)	HAAT	C	Owner	Year Std	Date Acq'd	Sales Price (000)	L M A	Format	1997 Est Revenue (000)†	Power Ratio	Avg '97 Local Comm	ARB 12+ Metro Shares (see rights)							
																Fall 1997	Summer 1997	Spring 1997	Winter 1997	Fall 1996	Summer 1996	Spring 1996	Winter 1996
WZGC	Atlanta	C1	92.9	99.0	909	c	CBS Corporation	65	9612		g1	Clsc Rock	11,500	1.14	4.6	3.9	4.0	4.3	4.2	3.4	3.1	3.1	3.3
WSTR	Smyrna	C	94.1	100.0	1020	g	Jefferson-Pilot	66	7401			Top 40	15,200	0.95	7.3	8.1	7.0	7.3	5.9	5.1	5.2	6.2	6.1
WPCH	Atlanta	C	94.9	99.0	984	d	Jacor Comm Inc	62	9301			Soft AC	18,000	1.26	6.5	5.1	5.9	4.9	5.6	6.2	5.9	5.1	6.0
WKLS	Atlanta	C	96.1	99.0	984	d	Jacor Comm Inc	60	9609			AOR	14,000	1.18	5.4	4.5	4.7	4.8	4.5	4.9	5.2	5.0	3.9
WMKJ	Newnan	A	96.7	1.0	545		Legacy Media LLC	48	9604	1,510		AC				0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
WFOX	Gainesville	C	97.1	100.0	1572		Chancellor Media	65	9705			Oldies	12,500	1.21	4.7	4.2	4.0	4.3	4.2	3.9	4.8	5.0	4.5
WHTA	Fayetteville	C3	97.5	6.6	637		Radio One Inc	66	9501	4,500	4	Urban	7,000	0.55	5.8	5.0	5.1	5.2	4.9	5.0	4.7	5.4	4.3
WSB	Atlanta	C	98.5	100.0	1020	b	Cox Radio Inc	34			1	Soft AC	14,000	1.14	5.6	5.7	5.5	5.1	4.3	4.7	5.2	5.1	5.9
WNNX	Atlanta	C	99.7	100.0	1034		Susquehanna	63	7402			Modern Rock	13,000	1.04	5.7	5.5	5.1	4.8	5.0	5.0	4.9	5.7	6.2
WKHX	Marietta	C	101.5	99.0	984	a	ABC Radio Inc	60	9602			Country	18,500	1.02	8.2	7.3	6.1	6.7	8.3	7.4	9.0	8.6	8.7
WLKO	Buford	A	102.3	4.0	400		Buford Bcstg Inc	70				Oldies				0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
WVEE	Atlanta	C	103.3	100.0	1020	c	CBS Corporation	48	9612			Urban	24,000	0.93	11.7	9.7	9.7	10.7	9.8	10.4	9.4	8.9	9.6
WJZF	La Grange	C1	104.1	60.0	1217	b	Cox Radio Inc	47	9704		1	Jazz	6,000	0.88	3.1	2.6	3.2	2.8	2.3	2.6	2.4	2.7	3.3
WALR	Athens	C1	104.7	100.0	981	f	Midwestern Bcstg	64	9209	6,000	2	Urban AC	12,000	0.78	7.0	6.2	6.2	5.8	6.0	6.4	5.7	4.8	5.0
WGST	Canton	C2	105.7	50.0	492	d	Jacor Comm Inc	64	9712 p	30,000	3	News/Talk	3,500	0.59	2.7	1.6	1.8	2.5	2.9	2.2	2.1	2.5	2.3
WYAY	Gainesville	C	106.7	100.0 cp	1417	a	ABC Radio Inc	49	9602			Country	10,000	1.03	4.4	3.4	4.0	3.6	3.4	4.2	4.2	3.6	3.0
WAMJ	Roswell	A	107.5	6.0	322		Johnson Bcstg Inc	97				Urban				0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
# FM Stations -					17	# Combos -			11	FM TOTALS					82.7	72.8	72.3	72.8	71.3	71.4	71.8	71.7	72.1

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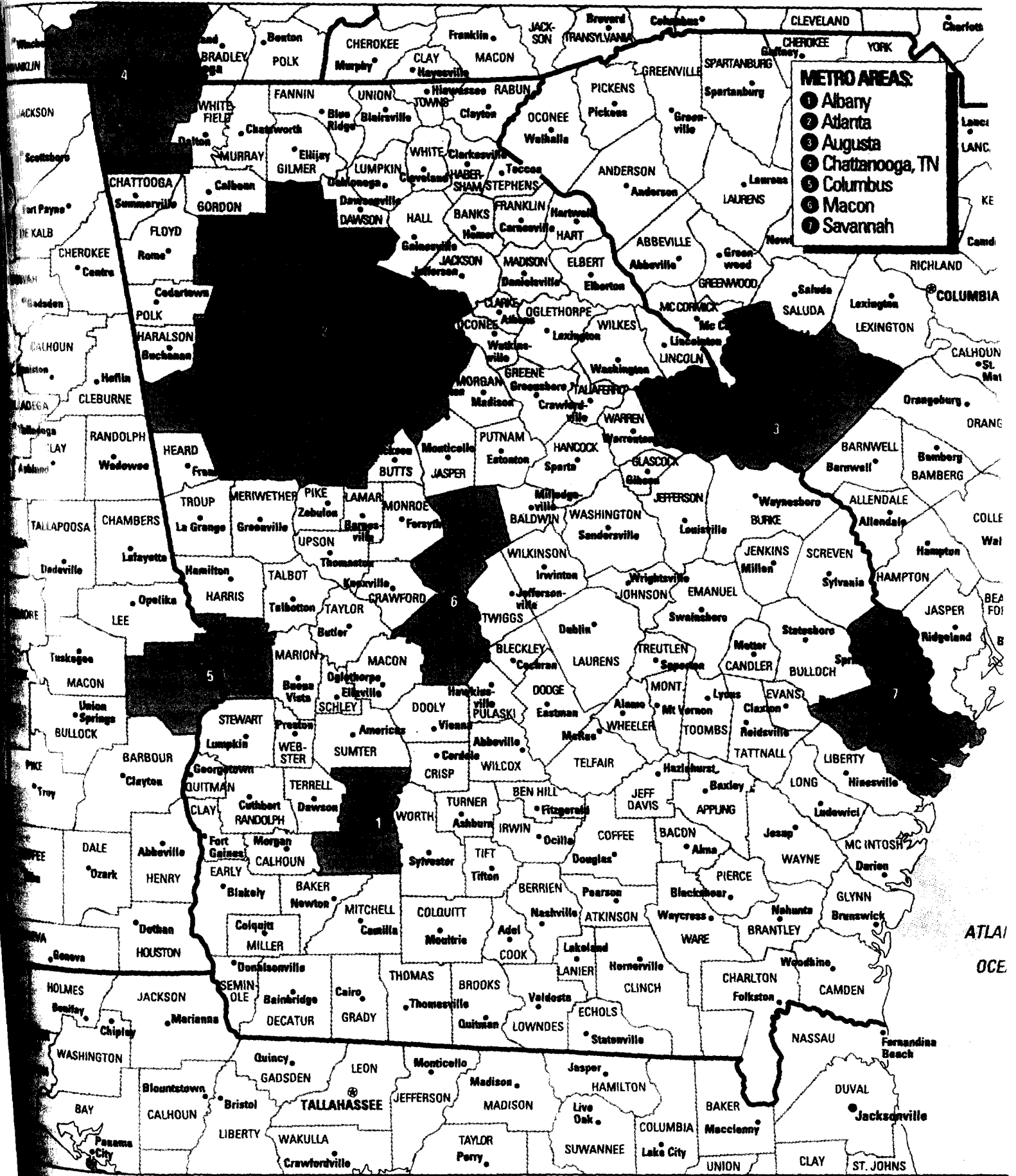
Indicates a change since last edition
See introduction section for interpretation of revenue estimates

EXHIBIT D

Comments of Cox Radio, Inc.
Opposition to USBLP's Reallotment Petition
April 1998

EXHIBIT D

Radio Advertising Source—Atlanta Metro Radio Market Map



- METRO AREAS:**
- ① Albany
 - ② Atlanta
 - ③ Augusta
 - ④ Chattanooga, TN
 - ⑤ Columbus
 - ⑥ Macon
 - ⑦ Savannah

EXHIBIT E